

2 October, 2007

LTD-0014

Rec: 10-02-07

Ms. Tish Eaton
Project Environmental Lead
Bonneville Power Administration
Portland, Oregon

Subject: Comments on the Rebuild of the Libby (FEC) to Troy 115-Kv Transmission Line Project's July 2007 Draft EIS.

Dear Ms Eaton,

Thank you for accepting my late comments and for discussing the EIS.

I had mentioned my concern that the draft's content and wording failed to sufficiently provide for the welfare and safety of the residents living or traveling along the present easement. Part of the concern resulted from the emphasis and wording pertaining to "permanently lost" bear habitat and the threat transmission lines would have to low-flying aircraft should the Quartz Creek Realignment be used. Along with the under developed adverse impact to residents (aesthetics, land use restrictions, safety, the count and proximity of those affected, road traffic load, etc.), a reader might quickly conclude that the easement road impact to grizzlies (even if they existed in the realignment area) and relocated power line threat to aviators should preclude realignment. The dismissive statement "residential use adjacent to the transmission line corridor is low density" misses, and obscures reality somewhat as well. Statements such as "(wires) can cause serious electrical shocks", though correct, also seem a little short of the mark if current and future residents living around the wires are truly being considered.

Another concern, more appropriately for FAA action, involves the reality that an increasingly dense neighborhood is located 6 to 7 1/2 mi west of Libby, Montana. Along the north edge of a mile of this neighborhood is a steeply sloped hill below which there is an existing easement for electrical power lines. The lines run roughly east and west and are both adjacent to, and within, 24 parcels, many with residences. These parcels front Kootenai River Road. On the other side of the road, another 41 parcels, most with residences, front on the Kootenai River. The road separating the two sets of parcels and residences, Kootenai River Road, is increasingly used by residents, contractors, hikers, fishermen, and other visitors to a state wildlife area to the west.

On occasion, BPA uses helicopters to inspect the power lines. Flights are made on the south side of the wires because of the steep mountain slope immediately to the north. Flight altitudes are slightly above wire or tower height (in some areas, trees force higher altitudes) and speeds range from hovering up to perhaps 30-40 knots.

I have forwarded a chart of the neighborhood and an aerial photo to help the FAA better understand the area. Some existing homes fail to show up on the photo (taken from the

draft EIS) and I have pointed out that more homes are continually being built. It is also important to point out that there are many additional homes exist along the power line back towards Libby that should be considered as well. The draft fails to reveal this.

I have been told that BPA's flights are conducted under a waiver to Part 91 of FAA regulations and I realize that most power lines probably transit the elsewhere area where much safer flight operation (very few people at risk) can be conducted.

However, I am requesting BPA and the FAA to please evaluate if a waiver is appropriate for the flights being conducted slightly above or adjacent to power wires or among trees extremely close to homes, people and vehicles. Safe auto rotation opportunities/landing sites do not exist; flight operation is being conducted in a red flight performance envelope through the entire neighborhood. Emergency auto rotations from 70-120' altitudes or certain flight system failures can be extremely risky even if sufficient landing area exists and people are not nearby. The steep hillside north of the wires forces emergencies to be handled within the neighborhood...something very worth avoiding.

The costs of the granted FAA "waiver" are primarily, and inappropriately, borne by numerous third parties; innocent people living or simply being near the power line. These people are currently inadequately revealed and represented in the draft EIS.

Is it possible, within populated neighborhoods, to simply inspect lines from the ground to safeguard third parties? If line checks are required to be performed immediately next to, or from slightly above wires and poles, shouldn't the Quartz Creek Realignment be considered in a different light; one that competes more favorably with unused but existing bear habitat and wire concerns where flights must be extremely rare, at best?

Thank you for telling me that helicopter power pole erection and wire stringing operations will not be conducted in populated areas. Extreme safety concerns for heavy weight sling operations involving 105' poles or long heavy steel cables exist.

Please let me know if I can provide additional information or clarify my concerns.

Sincerely yours,

John D. Smith